



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

MAR 16 1992

Ref: 8HWM-FF

Mr. Gary Baughman
Colorado Department of Health
4210 E. 11th Ave.
Denver, CO 80220

Re: OU 4 Final Workplan

Dear Mr. Baughman:

EPA has completed the review of the revised Final Phase I RFI/RI Workplan for OU 4, the Solar Ponds. EPA's previous concerns outlined in our letter dated December 23, 1991, have been adequately addressed. In the interest of moving forward with the project, EPA recommends conditional approval of the workplan upon satisfactory resolution of our ongoing discussions with DOE covering site-wide ARARs and DOE submitting an adequate vadose zone monitoring program.

Subsequent to our letter dated December 23, 1991, the RFP Risk Assessment Technical Working Group met to discuss alternative approaches to conducting Environmental Evaluations (EEs) within the developed area of the plant. EPA expects the OU 4 EE to be performed according to the procedure agreed upon in this meeting; it must comprise 1) a Habitat Survey Report for compliance with the Migratory Bird Treaty Act and Fish and Wildlife Coordination Act; 2) a Biological Survey report for compliance with the Endangered Species Act; and 3) an evaluation of exposure pathways including a site conceptual model.

In the event that the need to make significant changes to the Field sampling Plan (FSP) is identified in the course of the field work, DOE must submit an addendum to the workplan detailing the required changes. The addendum will be subject to approval under the terms of the IAG covering primary documents, as they are intended to modify an approved workplan which is itself a primary document.

Please do not hesitate to contact Arturo Duran of my staff at (303) 294-1080 with any question or comments you may have.

Sincerely,

A handwritten signature in dark ink, appearing to read "Martin Hestmark".

Martin Hestmark, Manager
Rocky Flats Project

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